

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

RightCHOICE Managed Care, Inc., *et al.*,

Plaintiffs,

v.

Hospital Partners, Inc.; Hospital Laboratory Partners, LLC; Empower H.I.S. LLC; RAJ Enterprises of Central Florida, LLC d/b/a Pinnacle Laboratory Services; Labmed Services, LLC; Serodynamics, LLC; David Byrns; Jorge Perez; James F. Porter, Jr.; Beau Gertz; and Mark Blake,

Defendants.

Civil Action No.  
5:18-CV-06037-DGK

**PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Plaintiffs, by and through undersigned counsel and in accordance with the Court's CM/ECF Civil and Criminal Administrative Procedures Manual and Users Guide, respectfully move the Court for leave to file documents under seal.

In support of this Motion, Plaintiffs state as follows:

1. At trial, Plaintiffs agreed to the Sero Defendants' request that Plaintiffs electronically file the slides Plaintiffs showed to the jury during Plaintiffs' opening statement, closing argument, and rebuttal closing argument.
2. Certain of the exhibits included in these slides have been marked "CONFIDENTIAL" and as such, are required to be filed under seal per the Protective Order.
3. In accordance with the Court's CM/ECF Civil and Criminal Administrative Procedures Manual and Users Guide, Plaintiffs' counsel will e-mail the proposed sealed

documents, together with a proposed Order granting leave to file the same under seal, to the courtroom deputy.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that the Court grant their Motion for Leave to File Documents Under Seal.

Dated: October 1, 2021

By: /s/ Michael L. Jente

**LEWIS RICE LLC**

Neal F. Perryman, MO Bar #43057  
Michael L. Jente, MO Bar #62980  
600 Washington Avenue, Suite 2500  
St. Louis, Missouri 63101  
T: (314) 444-7600  
nperryman@lewisrice.com  
mjente@lewisrice.com

-and-

**ROBINS KAPLAN LLP**

Jeffrey S. Gleason (admitted PHV)  
Munir R. Meghjee (admitted PHV)  
Jason W. Pfeiffer, MO Bar # 50104  
Nathaniel J. Moore (admitted PHV)  
Jaime J. Wing (admitted PHV)  
J. Haynes Hansen (admitted PHV)  
800 LaSalle Avenue, Suite 2800  
Minneapolis, Minnesota 55402  
T: (612) 349-8500  
F: (612) 339-4181  
jgleason@robinskaplan.com  
mmeghjee@robinskaplan.com  
jpfeiffer@robinskaplan.com  
nmoore@robinskaplan.com  
jwing@robinskaplan.com  
hhansen@robinskaplan.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically with the United States District Court for the Western District of Missouri, through the Court's CM/ECF system, on the 1st day of October 2021, with notice of case activity sent to counsel of record.

/s/ Michael L. Jente